

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**


**UNITED STATES OF AMERICA and
STATE OF TEXAS, ex rel. SHATISH
PATEL, M.D., HEMALATHA
VIJAYAN, M.D., and WOLLEY
OLADUT, M.D.,**


Plaintiffs,


VS.


**CATHOLIC HEALTH INITIATIVES,
ST. LUKE'S HEALTH SYSTEM
CORPORATION, ST. LUKE'S
COMMUNITY DEVELOPMENT
CORPORATION - SUGAR LAND,
DAVID FINE, DAVID KOONTZ, and
STEPHEN PICKETT,**

Defendants.
















CIVIL ACTION NO. 4:17-CV-01817

RELATORS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS RELATORS' ORIGINAL COMPLAINT

Relators Shatish Patel, M.D., Hemalatha Vijayan, M.D., and Wolley Oladut, M.D. hereby ask the Court to deny Defendants' Motion to Dismiss Relators' Original Complaint (Dkt. 18.), or if the Court dismisses one or more claim asserted in the Complaint, to give Relators leave to amend. In support of their opposition to Defendants' Motion to Dismiss, Relators submit a memorandum of law, a proposed order, and an appendix of legal authorities as per this Court's procedures.

Dated: November 21, 2017

Respectfully submitted,

/s/ Hiren P. Patel

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Attorney-in-Charge for Relators

CERTIFICATE OF SERVICE

I certify that on November 21, 2017, a true and correct copy of this document was electronically served via the Court's CM/ECF system to counsel for all parties properly registered with the Court's CM/ECF system.

/s/ Hiren P. Patel

Hiren P. Patel